

1 DONALD A. LATTIN, ESQ., NV Bar No. 693  
2 CAROLYN K. RENNER, ESQ., NV Bar No. 9164  
3 MAUPIN, COX & LEGOY  
4 4785 Caughlin Parkway  
5 Reno, Nevada 89519  
6 (775) 827-2000 (Telephone)  
7 (775) 827-2185 (Facsimile)

8 *Attorneys for Defendants*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 FREDERICK A. COOPER, an individual,  
12 and KATHERINE H. COOPER, an  
13 individual,

CASE NO. 2:13-cv-0036-JCM-GWF

14 Plaintiffs,

15 JOINT MOTION TO STAY

16 v.

17 PHILIPP D. NICK, an individual; ELLEN H.  
18 HARDYMON, an individual; SUZANNE H.  
19 NICK IRREVOCABLE FAMILY TRUST  
20 ONE, an Ohio trust; Trustee of the  
21 SUZANNE H. NICK IRREVOCABLE  
22 FAMILY TRUST ONE, an Ohio trust;  
23 SUZANNE H. NICK IRREVOCABLE  
24 FAMILY TRUST TWO, an Ohio trust;  
25 Trustee of the SUZANNE H. NICK  
26 IRREVOCABLE FAMILY TRUST TWO, an  
Ohio trust; THOMAS H. HAVENS  
IRREVOCABLE FAMILY TRUST ONE, an  
Ohio trust; Trustee of the THOMAS F.  
HAVENS IRREVOCABLE FAMILY  
TRUST ONE, an Ohio trust; THOMAS F.  
HAVENS IRREVOCABLE FAMILY  
TRUST TWO, an Ohio trust; Trustee of the  
THOMAS F. HAVENS IRREVOCABLE  
FAMILY TRUST TWO, an Ohio trust; and  
DOES 1-5,

Defendants.

1           The parties entered a Settlement Agreement, dated February 28, 2013. In order to conserve  
2           judicial resources while ensuring that the parties fulfill their obligations and retain their rights under  
3           the Settlement Agreement, all parties hereby move this Court for an Order staying all proceedings  
4           in this matter, which will remain as an inactive case on the Court's docket, pending the full  
5           performance of the parties under the Settlement Agreement.  
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7           The Settlement Agreement contemplates a sale of some or all of the parties' interests Harbor  
8           Structured Finance, LLC not later than October 29, 2013. The parties fully expect the sale of  
9           interests to occur by or before that date, in which case they will timely file a dismissal of all claims.  
10          In the event that the sale interests does not occur by October 29, 2013, the parties will timely request  
11          the Court activate the case and submit a proposed case schedule or request a conference with the  
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Court to establish appropriate deadlines.

Dated this 5<sup>th</sup> day of March, 2013. Dated this 5<sup>th</sup> day of March, 2013.

MAUPIN, COX & LEGOY

By:   
DONALD A. LATTN, ESQ.  
Nevada State Bar #693  
CAROLYN K. RENNEN, ESQ.  
Nevada State Bar #9164  
4785 Caughlin Parkway  
Reno, NV 89519  
(775) 827-2000 (Telephone)  
(775) 827-2185 (Facsimile)


*Attorneys for Defendants*

GORDON SILVER

By: /s/ Eric D. Hone  
ERIC D. HONE, ESQ.  
Nevada State Bar #8499  
ELIAS P. GEORGE, ESQ.  
Nevada State Bar #12379  
3960 Howard Hughes Parkway, 9<sup>th</sup> Floor  
Las Vegas, Nevada 89169  
(702) 796-5555 (Telephone)  
(702) 369-2666 (Facsimile)

*Attorneys for Plaintiffs*

IT IS SO ORDERED:

  
GEORGE FOLEY, JR.  
United States Magistrate Judge

DATED: March 6, 2013